

**UNITED STATES DISTRICT COURT  
For the  
DISTRICT OF WYOMING**

<b>CHERISA APPLEHUNT, as next friend of A.A., a minor,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>vs.</b>	)	<b>Civil Action No. 22-CV-138</b>
	)	
<b>WALGREEN COMPANY, INC., d/b/a WALGREENS, a Foreign Corporation</b>	)	
	)	
<b>Defendant.</b>	)	

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**DEFENDANT’S JOINT PROPOSED STATEMENT OF THE CASE**

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Walgreens, by and thru their undersigned counsel submit the following proposed statement of the case:

I. Certification of Good Faith Conferral

Defendants state that they have conferred with counsel for Plaintiff in good faith on the following proposed statement. Plaintiff has notified Defendant that they object.

II. Proposed Statement

This case involves an error on the label of a prescription filled for minor A.A. by Walgreens Pharmacy in Cheyenne, Wyoming on September 23, 2016. A.A. was given a prescription for Zantac 36mg per day. Zantac is also known as ranitidine. A.A. was given the correct prescription for Zantac but an error occurred when the dosage instructions on the bottle directed her to take 150 mg per day rather than the prescribed 36 mg per day. This error was caught on October 12, 2016, by A.A.’s family doctor.

Plaintiff contends this dosage error caused permanent injuries to A.A, including physical pain, emotional pain and suffering, and permanent physical injury. Plaintiff has made no claim

for medical expenses, past or future, or any economic damages. While Walgreens admits that the error occurred, it contends that the medication dosing error did not cause any injuries alleged by A.A.

RESPECTFULLY REQUESTED this 23<sup>th</sup> day of June 2023,

/S/ James C Worthen  
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*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of August 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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James C. Worthen